

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

Brock Fredin,

Plaintiff,

v.

Case No. 0:20-cv-01929-SRN-HB

Jamie Kreil,

Defendant.

**MOTION REGARDING CONTINUED SEALING
OF DOCUMENTS PURSUANT TO LOCAL RULE 5.6**

Jamie Kreil submits as follows under Local Rule 5.6 relating to documents temporarily filed under seal in connection with Jamie Kreil's Motion for an Order to Show Cause [Docket No. 51]. Kreil requested Brock Fredin's position on continued sealing of the documents at issue but Fredin did not respond, despite Kreil's notice that she would file the instant Motion by close of business today (the deadline to file).

The following documents were filed under temporary seal:

Sealed Docket Number	Redacted Docket Number	Document Description	Precisely Identify Information: <ul style="list-style-type: none"> • That the parties agree should remain sealed; • The parties agree should be unsealed; • About which the parties disagree. 	Reason Why Document Should Remain Sealed or Be Unsealed
55	N/A	Ex. A to Declaration of Anne M. Lockner in Support of Jamie Kreil's Motion for an Order to Show Cause: Pdf image of video currently hosted at https://youtube/watch?v=ZI3faQ8g8MA	<p>Kreil takes the position that the document should remain sealed.</p> <p>Fredin did not respond by the deadline to file this Motion, and thus Kreil is unaware of Fredin's position on continued sealing.</p>	Kreil states that the document should remain sealed because Fredin created it in an effort to harass and intimidate counsel and the Court, and did so in violation of the Court's Order (Dkt. 39) that Fredin not create additional harassing websites and videos. The prejudicial effect of preserving it in the public record here outweighs the public interest in accessing it.
55-1	N/A	Ex. B to Declaration of Anne M. Lockner in Support of Jamie Kreil's Motion for an Order to Show Cause: Pdf image of video currently hosted at https://youtube/watch?v=VyzUwT2wlss	<p>Kreil takes the position that the document should remain sealed.</p> <p>Fredin did not respond by the deadline to file this Motion, and thus Kreil is unaware of Fredin's position on continued sealing.</p>	Kreil states that the document should remain sealed because Fredin created it in an effort to harass and intimidate counsel and the Court, and did so in violation of the Court's Order (Dkt. 39) that Fredin not create

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				<p>additional harassing websites and videos. The prejudicial effect of preserving it in the public record here outweighs the public interest in accessing it.</p>
55-2	N/A	<p>Ex. C to Declaration of Anne M. Lockner in Support of Jamie Kreil's Motion for an Order to Show Cause: Pdf version of webpage found at susanrichardnelson.com</p>	<p>Kreil takes the position that the document should remain sealed.</p> <p>Fredin did not respond by the deadline to file this Motion, and thus Kreil is unaware of Fredin's position on continued sealing.</p>	<p>Kreil states that the document should remain sealed because Fredin created it in an effort to harass and intimidate counsel and the Court, and did so in violation of the Court's Order (Dkt. 39) that Fredin not create additional harassing websites and videos. The prejudicial effect of preserving it in the public record here outweighs the public interest in accessing it.</p>

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61-1	N/A	Ex. A to Second Declaration of Anne M. Lockner in Support of Jamie Kreil's Motion for an Order to Show Cause: Thumb drive containing electronically archived versions of A and B (to original Lockner Declaration)	<p>Kreil takes the position that the document should remain sealed.</p> <p>Fredin did not respond by the deadline to file this Motion, and thus Kreil is unaware of Fredin's position on continued sealing.</p>	<p>Kreil states that the document should remain sealed because Fredin created it in an effort to harass and intimidate counsel and the Court, and did so in violation of the Court's Order (Dkt. 39) that Fredin not create additional harassing websites and videos. The prejudicial effect of preserving it in the public record here outweighs the public interest in accessing it.</p>

Dated: January 8, 2021

ROBINS KAPLAN LLP

By: /s/ Anne M. Lockner

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